UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA PHILADELPHIA DIVISION

In re:

Gerald E. Kane

Debtor

Marianne Kane

Joint/Co Debtor

CSMC 2018-SP3 TRUST

Movant

v.

Gerald E. Kane

Debtor/Respondent

Marianne Kane

Co-Debtor

Kenneth E. West, Esquire

Trustee/Respondent

Bankruptcy No. 21-13401-amc

Chapter 13

Hearing Date: December 19, 2024

Hearing Time: 11:00a.m.

Location: Courtroom #4, United States Bankruptcy Court, Robert N.C. Nix Sr. Federal Courthouse 900 Market Street,

Suite 204 Philadelphia, PA 19107

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY AND CO-DEBTOR STAY RESPONSE DEADLINE AND HEARING DATE

CSMC 2018-SP3 TRUST has filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. §362(d)(1); for costs and disbursements of this action, and for such other and further relief as to the Court may deem just and proper.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the motion, then on or before December 5, 2024, you or your attorney must filed a response to the Motion. (see Instructions on next page).
 - (a) File an answer explaining your position at: Robert N.C. Nix Sr. Federal Courthouse 900 Market Street, Suite 204 Philadelphia, PA 19107.

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough that it will be received on or before the dates stated above; and

(b) Mail a copy to the movant's attorney:

Michelle L. McGowan, Esquire 13010 Morris Rd., Suite 450 Alpharetta, GA 30004 Telephone: 470-321-7112

Email: mimcgowan@raslg.com

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the Motion is scheduled to be held before Chief Judge Ashely M. Chan on December 19, 2024, at 11:00 a.m. in Courtroom #4, United States Bankruptcy Court, Robert N.C. Nix Sr. Federal Courthouse 900 Market Street, Suite 204 Philadelphia, PA 19107. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's Office in Philadelphia at 215-408-2800 or Reading at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.

Dated: 11/20/2024

Robertson, Anschutz, Schneid, Crane & Partners, PLLC

Attorney for Movant 13010 Morris Rd., Suite 450 Alpharetta, GA 30004

Telephone: 470-321-7112 By: /s/ Michelle L. McGowan

Michelle L. McGowan PA Bar Number 62414

Email: mimcgowan@raslg.com